



Kevin Fritz
Partner
Direct (212) 655-3570
kaf@msf-law.com

July 10, 2025

VIA ECF

Hon. Lewis J. Liman
United States District Court
Southern District of New York
500 Pearl Street, Room 1620
New York, NY 10007

**Re: *Lively v. Wayfarer Studios LLC et al.*, No. 1:24-cv-10049-LJL;
rel. Wayfarer Studios LLC et al. v. Lively et al., No. 1:25-cv-00449-LJL**

Dear Judge Liman:

On behalf of Wayfarer Studios LLC, Justin Baldoni, Jamey Heath, Steve Sarowitz, It Ends With Us Movie LLC, Melissa Nathan, The Agency Group PR LLC, and Jennifer Abel (collectively, the “Wayfarer Parties”), we write pursuant to Rule 4.b of Attachment A to Your Honor’s Individual Rules to respectfully request that the Court preliminarily seal Exhibits A, B, C, and D to the Wayfarer Parties’ Motion to Compel, filed contemporaneously herewith.

Exhibit A is Blake Lively’s Amended Initial Disclosures. Exhibit B is Ms. Lively’s Responses and Objections to the Wayfarer Parties’ First Set of Requests for Production of Documents. Exhibit C is Ms. Lively’s Responses and Objections to the Wayfarer Parties’ First Set of Interrogatories. Exhibit D is Ms. Lively’s Responses and Objections to Wayfarer Studios LLC’s Fourth Set of Requests for Production of Documents. Those documents have been designated as confidential by Ms. Lively.

In accordance with Rule 4.b of Attachment A, the Wayfarer Parties respectfully request that the Court not rule on this letter-motion to seal for one week, so that the parties can meet and confer, and Ms. Lively may file a motion for continued sealing if she so chooses.

Respectfully submitted,

/s/ Kevin Fritz
MEISTER SEELIG & FEIN PLLC
Mitchell Schuster
Kevin Fritz
125 Park Avenue, 7th Floor
New York, NY 10017
Tel: (212) 655-3500
Email: ms@msf-law.com
kaf@msf-law.com

Hon. Lewis J. Liman

Page 2

July 10, 2025

LINER FREEDMAN TAITELMAN + COOLEY, LLP

Bryan J. Freedman (*pro hac vice*)

Ellyn S. Garofalo (*pro hac vice*)

Miles M. Cooley (*pro hac vice*)

Theresa M Troupson (*pro hac vice*)

Summer Benson (*pro hac vice*)

Jason Sunshine

1801 Century Park West, 5th Floor

Los Angeles, CA 90067

Tel: (310) 201-0005

Email: bfreedman@lftcllp.com

egarofalo@lftcllp.com

mcooley@lftcllp.com

ttroupson@lftcllp.com

sbenson@lftcllp.com

[jsunshine@lftcllp.com](mailto:j sunshine@lftcllp.com)

Mitra Ahouraian (*pro hac vice*)

2029 Century Park East

4th Floor

Los Angeles, CA 90067

(310) 376-7878

Email: mitra@ahouraianlaw.com

cc: all counsel of record (via ECF)